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Liquidating Trust*

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*Pro Hoc Vic Counsel for Alfred H. Siegel, the
Liquidating Trustee of Circuit City Stores, Inc.
Liquidating Trust*

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

**CIRCUIT CITY STORES, INC., et al.,

Debtors.**

Chapter 11

Case No. 08-35653-KRH

Jointly Administered

MOTION FOR LEAVE OF COURT TO ATTEND HEARING BY TELEPHONE

Alfred H. Siegel, the Liquidating Trustee of Circuit City Stores (the “Trustee”), Inc. Liquidating Trust (the “Liquidating Trust” and/or “Trust”), in the above-captioned Chapter 11 cases, by and through his undersigned counsel, Ashley McDow (“Ms. McDow”) of Baker & Hostetler LLP (“Baker”), and pursuant to the Court’s Order Pursuant to Bankruptcy Code Sections 102 and 105, Bankruptcy Rules 2002 and 9007, and Local Bankruptcy Rules 2002-1

and 9013-I Establishing Certain Notice, Case Management, and Administrative Procedures, hereby moves for leave of Court to attend the August 25, 2015 status hearing by telephone. In support thereof, Baker states as follows:

1. On November 10, 2008, the above-captioned debtors and debtors-in-possession (collectively, “Debtors”), filed voluntary petitions in this Court for relief under chapter 11 of title 11 of the United States Bankruptcy Code (the “Bankruptcy Code”).

2. On November 13, 2008, the Court entered an Order Pursuant to Bankruptcy Code Sections 102 and 105, Bankruptcy Rules 2002 and 9007, and Local Bankruptcy Rules 2002-1 and 9013-1 Establishing Certain Notice, Case Management, and Administrative Procedures (the “Order”). Page 5 of Exhibit A to the Order states as follows:

(g) Upon request, the Court may allow counsel to listen to a hearing by telephone. If a matter is contested, counsel must attend in person, unless leave of the court is granted on a case by case basis.

3. On August 9, 2010, the Debtors and the Committee filed the *Second Amended Joint Plan of Liquidation of Circuit City Stores, Inc. and its Affiliated Debtors and Debtors in Possession and its Official Committee of Creditors Holding Administrative Claims* (the “Plan”), which provided for the liquidation of the Debtors’ assets and distribution of the proceeds thereof under chapter 11 of the Bankruptcy Code.

4. On September 10, 2010, the Court signed the Order confirming the Plan. On November 1, 2010, the Plan became effective, the Liquidating Trust came into being and the Trustee assumed the rights and obligations as provided for in the Plan and Liquidating Trust Agreement.

5. On or about February 25, 2011, the Trustee filed the Liquidating Trust’s Sixth Omnibus Objection to certain Claims (“Sixth Objection”, Dkt. No. 10044).

6. On or about February 25, 2011, the Trustee filed the Liquidating Trust’s Seventh Omnibus Objection to certain Claims (“Seventh Objection”, Dkt. No. 10045).

7. The Sixth Objection and Seventh Objection included objections (the “Funds Objections”) to claims (“Claims”) filed by California Self Insurance Security Fund (the “Fund”), as provided in the chart below.

8. The omnibus and status hearings, among other things, for the Sixth Objection and Seventh Objection related to the Claims are currently scheduled for August 25, 2015 at 2:00 p.m. EDT, as follows:

Subject to Omnibus Objection No.	Respondent	Claim No.	Status
6	California Self Insurers Security Fund	Claim No. 11721	The Claimant will withdraw its claim.
6	California Self Insurers Security Fund	Claim No. 11811	The Claimant will withdraw its claim.
6	California Self Insurers Security Fund	Claim No. 14971	The Claimant will withdraw its claim.
6	California Self Insurers Security Fund	Claim No. 14973	The Claimant will withdraw its claim.
6	California Self Insurers Security Fund	Claim No. 15004	The Claimant will withdraw its claim.
6	California Self Insurers Security Fund	Claim No. 15031	The Claimant will withdraw its claim.
6	California Self Insurers Security Fund	Claim No. 15030	The Claimant will withdraw its claim.
7	California Self Insurers Security Fund	Claim No. 15028	The Claimant will withdraw its claim.
7	California Self Insurers Security Fund	Claim No. 15029	The Claimant will withdraw its claim.

9. Baker has been retained by the Trustee as special counsel to assist and represent the Trustee with respect to the Funds Objections.

10. Pachulski Stang Ziehl & Jones Law Firm (the “PSZJ Law Firm”) has appeared in person in these matters on behalf of the Trustee, and will do so for August 25, 2015 status hearing.

11. Ms. McDow of Baker will not be able to appear in person for the status hearing on August 25, 2015, and Baker respectfully asks for leave of court pursuant to the Order so that Ms. McDow may appear by telephone with counsel from PSZJ Law Firm present.

12. Based on Ms. McDow's unique knowledge of the facts and legal arguments in the case, the ends of justice would be served by allowing Ms. McDow to appear by telephone.

WHEREFORE, Baker respectfully requests that this Court grant its Motion and enter an Order substantially in the form annexed hereto permitting Ms. McDow to appear and be heard by telephone at the status hearing on August 25, 2015 on behalf of the Trustee and grant such other relief as necessary and appropriate.

Dated: August 21, 2015

Respectfully submitted,

BAKER & HOSTETLER LLP

By: /s/ Ashley M. McDow
Ashley M. McDow (Cal. Bar No. 245114)
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11601 Wilshire Boulevard, Suite 1400
Los Angeles, CA 90025-0509
Telephone: 310.820.8800
Facsimile: 310.820.8859
Email: amcdow@bakerlaw.com

Dated: August 21, 2015

Respectfully submitted,

BAKER & HOSTETLER LLP

By: /s/ Dena S. Kessler
Dena S. Kessler (VBN 78680)
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*Counsel for Alfred H. Siegel, the Liquidating
Trustee of Circuit City Stores, Inc. Liquidating
Trust*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 21st day of August, 2015, I will file the foregoing MOTION FOR LEAVE OF COURT TO ATTEND HEARING BY TELEPHONE with the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

Dated: August 21, 2015

Respectfully submitted,

BAKER & HOSTETLER LLP

By: /s/ Ashley M. McDow
Ashley M. McDow (Cal. Bar No. 245114)
BAKER HOSTETLER LLP
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In re:

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Chapter 11

Case No. 08-35653-KRH

Jointly Administered

**ORDER GRANTING MOTION FOR LEAVE OF COURT
TO ATTEND HEARING BY TELEPHONE**

Upon consideration of the Motion for Leave of Court to Attend Hearing by Telephone (the “Motion”) filed by Ashley McDow (“Ms. McDow”) of Baker & Hostetler LLP, and it appearing that the Motion has been served on the interested parties and the Office of the United States Trustee for the Eastern District of Virginia, and after due deliberation and sufficient cause appearing therefore, it is hereby,

ORDERED, that the Motion is GRANTED and Ms. McDow is permitted to appear and be heard by telephone at the hearing on August 25, 2015 on behalf of the Trustee.

Entered this _____ day of _____, 2015.

United States Bankruptcy Judge

I ask for this:

By: /s/ Ashley M. McDow
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*Counsel for Alfred H. Siegel, the
Liquidating Trustee of Circuit City Stores,
Inc. Liquidating Trust*

I ask for this:

By: /s/ Dena S. Kessler
Dena S. Kessler (VBN 78680)
BAKER & HOSTETLER LLP
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Liquidating Trust*

Local Rule 9022-1(C) Certification

The foregoing Order was endorsed by and/or served upon all necessary parties
pursuant to Local Rule 9022-1(C).

/s/ Ashley M. McDow

Ashley M. McDow

PARTIES TO RECEIVE COPIES

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Committee*

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